

Lake Michigan Regional CHP Workshop

Air Pollution Control Permitting

November 10, 1999

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Categories of Air Permits

- Construction Permits
 - May be needed before commencing construction of a project
 - Review of plans to facilitate compliant operation
 - Opportunity to place conditions on a project
- Operating Permits
 - Covers for routine operation of a project
 - Needed if a construction permit is needed
 - Follows up on requirements established by the construction permit

Construction Permits

- Compliance with emission limits, e.g., USEPA New Source Performance Standard for Turbines, 40 CFR 60, Subpart GG
- Compliance with programmatic values, e.g., federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, and state rules for non-attainment new source review (NSR) and Emission Reduction Market System (ERMS)

Applicability of Programmatic Rules

- Based on permitted emissions (in absence of permit, based on potential emissions)
- Determined pollutant by pollutant, e.g., nitrogen oxides, carbon monoxide, volatile organic material.
- May be affected by location (attainment/non-attainment) and nature of existing source.

Applicability of Programmatic Rules - Warning Levels

- Project potential emissions of NO_x approach 32 ton/year (compared to PSD significant threshold of 40 ton/year)
- Project potential emissions of VOM approach 8 ton/year (compared to ERMS applicability threshold of 10 ton/season) or project will bring total permitted VOM emission of source to 25 ton/year (major source level) or source is already major and has recently had or is considering other projects involving VOM emission (five years before and after).

Exemptions from Permits

- Exemptions do exist for small units
 - Projects must still comply with applicable rules even if exempt from permits
 - Some projects need permits even if individual units are exempt, to facilitate compliance with programmatic rules, i.e., PSD, NSR, and ERMS.

State Permit Exemption

35 Ill. Adm. Code 201.146(i)

Any stationary internal combustion engine with a rated power output of less than 1118 kW (1500 horsepower), except that a permit shall be required for any stationary gas turbine engine with a rated heat input at peak load of 10.7 gigajoules/hr (10 mmbtu/hr) or more that is constructed, reconstructed or modified after October 3, 1997 and that is subject to requirements of 40 CFR 60, Subpart GG;

For further information call the
Bureau of Air, Permit Section
217/782-2113